



February 5, 2005

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Washington, DC 20554

**Re: WT Docket No. 01-309**

Dear Ms. Dortch:

Self Help for Hard of Hearing (SHHH) has been an active participant in this proceeding, urging the Commission to take prompt regulatory action to facilitate the usability of cellular and PCS handsets by hearing aid users.

SHHH has monitored ex parte filings by various parties and believes that in some instances, those filings have inadequately disclosed the nature of the presentations made to the Commissioners and their Staffs, in violation of Section 1.1206(b) of the Rules. In a Public Notice, released October 11, 2000, FCC 00-358, the Commission cautioned that "[The summaries [in written reports of oral ex parte contacts] must describe the substance of the new data or arguments and not merely list the subjects discussed. Generally, more than a one or two sentence description is required." The public notice further cautioned that violations "may result in a person's disqualification from participating in a proceeding or in other sanctions, such a forfeiture."

In two recent filings, made on January 17 and 27, 2003, the Cellular Telecommunications and Internet Association ("CTIA") stated only that its representatives discussed "current activities in which the wireless industry is engaged to address the usability of wireless products by people with hearing disabilities, and technical issues related to interference mitigation and inductive coupling." This language does not include any description of the substance of the activities in question. Having urged in this proceeding that the wireless industries efforts have been inadequate, SHHH would like to know exactly what efforts the wireless industry claims to have undertaken and whether CTIA urged that those efforts have been sufficient to warrant the Commission's refraining from taking the regulatory actions that SHHH has urged be taken.

SHHH requests that the Commission enforce Section 1.1206(a) of the Rules, including at a minimum directing CTIA to supplement its ex parte reports with a description of its presentations in

adequate detail to enable the public to determine the full substance of those presentations.

Respectfully submitted,

A handwritten signature in black ink that reads "Brenda Battat". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Brenda Battat  
Director of Public Policy and State Development

cc: John Muleta, Chief, Wireless Telecommunications Bureau  
Mindy Littell, Esq.  
Blaise Scinto, Esq.  
James Schlichting, Esq.  
Cellular Telecommunications and Internet Association (CTIA)